ATTACHMENT 50

1		
2	UNITED STATES DISTRICT COURT	
3	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
4	SAN FRANCISCO DIVISION	
5	x	
6	SURGICAL INSTRUMENT SERVICE COMPANY, INC.,	
7	Plaintiff,	
8	-against-	
9	INTUITIVE SURGICAL, INC.,	
10	Defendant.	
11	x	
12	Virtual Zoom Deposition	
13	March 6, 2023	
	8:30 a.m.	
14		
15		
16	VIRTUAL VIDEO DEPOSITION of JEAN SARGENT,	
17	in the above-entitled action, held at the	
18	above time and place, taken before Jeremy	
19	Richman, a Shorthand Reporter and Notary	
20	Public of the State of New York, pursuant to	
21	the Federal Rules of Civil Procedure, and	
22	stipulations between Counsel.	
23		
24	* * *	
25		
		Demo 1
		Page 1

	Y GAD GENER		I GARGENTE
1	J. SARGENT	1	J. SARGENT
2	Q. What does the number 13:43:53	2	MR. VAN HOVEN: Objection to 13:46:18
3	75 percent represent in this paragraph? 13:43:57	3	form. 13:46:19
4	A. That number would be the 13:43:59	4	A. No. 13:46:19
5	amount of times that a product was put 13:44:05	5	Q. What robot, what model did 13:46:22
6	in a bin to be returned to that third 13:44:09	6	MarinHealth have? 13:46:28
7 8	party for repair or refurbishment. 13:44:13	7	MR. VAN HOVEN: Objection to 13:46:29 form. 13:46:29
	Q. Are you assuming that all 13:44:16 Vizient members would use this SIS 13:44:25	8 9	form. 13:46:29 A. Si. 13:46:29
9 10	Vizient members would use this SIS 13:44:25 reset service? 13:44:27	10	
11		11	Q. Do you know how many Si 13:46:32 EndoWrists Marin had in inventory? 13:46:42
12	A. My assumption is yes, because 13:44:30 of the cost savings. 13:44:32	12	A. No. 13:46:48
13	Q. Okay. So when, what is the 13:44:34	13	Q. Would you even be able to 13:46:49
14	date you were thinking that this 13:44:39	14	estimate? 13:46:51
15	collection was taking place? 13:44:41	15	A. No. Every facility is 13:46:57
16	A. When I was working with 13:44:42	16	different on what quantities they keep 13:46:59
17	Marin, and Keith presented it to Marin 13:44:48	17	on hand. 13:47:01
18	and also presented bins for the 13:44:53	18	Q. So just so I understand, 13:47:01
19	EndoWrist to be placed in, that was 13:44:59	19	let's assume, for purposes of this 13:47:03
20	when I thought it would be kicking off. 13:45:01	20	discussion, that they have a hundred 13:47:07
21	And then it was stopped, and at that 13:45:03	21	EndoWrists in inventory. Can you hold 13:47:09
22	point I didn't know when it would be 13:45:08	22	that assumption in your head? 13:47:10
23	used again, because I didn't know when 13:45:10	1	A. Yes. 13:47:12
24	SIS would work through their issues 13:45:12	24	Q. And let's assume they 13:47:15
25	with Da Vinci. 13:45:16	25	collected 20, that in the process, when 13:47:16
	Page 214		Page 216
		_	
1	J. SARGENT	1	J. SARGENT
1 2	J. SARGENT Q. Okay. 13:45:18	1 2	J. SARGENT they had bins available for collection, 13:47:18
2	Q. Okay. 13:45:18	2	they had bins available for collection, 13:47:18
2 3	Q. Okay. 13:45:18A. Intuitive. 13:45:20	2 3	they had bins available for collection, 13:47:18 that there were 20 EndoWrists that were 13:47:20
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Okay. 13:45:18 A. Intuitive. 13:45:20 Q. So when you were working with 13:45:21 Marin, did SIS actually provide 13:45:24 collection bins for, at MarinHealth? 13:45:26 A. I was told, yes. 13:45:32 Q. Did you ever see them? 13:45:33 A. No. 13:45:35 Q. Do you know how many 13:45:35 EndoWrists were collected from Marin? 13:45:41 A. I was told at the time, I 13:45:46 don't remember the exact number, but I 13:45:48 believe it was less than 20. 13:45:49 Q. Do you know how many 13:45:51 EndoWrists from Marin were actually 13:45:54 reset with additional uses? 13:45:57 A. No. 13:45:59 Q. Do you know how many at the 13:46:02 time that there were that you were 13:46:05 told there were collection bins 13:46:07 available for EndoWrists to be 13:46:09 collected by SIS, do you know how many 13:46:11	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	they had bins available for collection, 13:47:18 that there were 20 EndoWrists that were 13:47:20 collected by SIS. Can you hold that 13:47:23 assumption in your head also? 13:47:27 A. Yes. 13:47:30 Q. Based on the way you've gone 13:47:30 about your work in this matter in 13:47:34 developing and identifying the 13:47:36 collection rate, would you agree that 13:47:38 the collection rate for that, for 13:47:39 MarinHealth, was 20 percent? 13:47:42 MR. VAN HOVEN: Objection to 13:47:43 form. 13:47:46 Q. Under that hypothetical, is 13:47:46 it a 20 percent collection rate, from 13:47:51 MR. VAN HOVEN: Objection to 13:47:51 form. 13:47:52 A. Yes, the program had just 13:47:52 started. 13:47:56 Q. Right, I'm asking you a 13:47:57 hypothetical. You've already told me 13:47:59
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Okay. 13:45:18 A. Intuitive. 13:45:20 Q. So when you were working with 13:45:21 Marin, did SIS actually provide 13:45:24 collection bins for, at MarinHealth? 13:45:26 A. I was told, yes. 13:45:32 Q. Did you ever see them? 13:45:33 A. No. 13:45:35 Q. Do you know how many 13:45:35 EndoWrists were collected from Marin? 13:45:41 A. I was told at the time, I 13:45:46 don't remember the exact number, but I 13:45:48 believe it was less than 20. 13:45:49 Q. Do you know how many 13:45:51 EndoWrists from Marin were actually 13:45:54 reset with additional uses? 13:45:57 A. No. 13:45:59 Q. Do you know how many at the 13:46:02 time that there were that you were 13:46:05 told there were collection bins 13:46:07 available for EndoWrists to be 13:46:09 collected by SIS, do you know how many 13:46:11 EndoWrists MarinHealth had in 13:46:13	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	they had bins available for collection, 13:47:18 that there were 20 EndoWrists that were 13:47:20 collected by SIS. Can you hold that 13:47:23 assumption in your head also? 13:47:27 A. Yes. 13:47:30 Q. Based on the way you've gone 13:47:30 about your work in this matter in 13:47:34 developing and identifying the 13:47:36 collection rate, would you agree that 13:47:38 the collection rate for that, for 13:47:39 MarinHealth, was 20 percent? 13:47:42 MR. VAN HOVEN: Objection to 13:47:43 form. 13:47:46 Q. Under that hypothetical, is 13:47:46 it a 20 percent collection rate, from 13:47:51 MR. VAN HOVEN: Objection to 13:47:51 form. 13:47:52 A. Yes, the program had just 13:47:52 started. 13:47:56 Q. Right, I'm asking you a 13:47:57 hypothetical. You've already told me 13:47:59 you think that Marin, that SIS 13:48:01
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Okay. 13:45:18 A. Intuitive. 13:45:20 Q. So when you were working with 13:45:21 Marin, did SIS actually provide 13:45:24 collection bins for, at MarinHealth? 13:45:26 A. I was told, yes. 13:45:32 Q. Did you ever see them? 13:45:33 A. No. 13:45:35 Q. Do you know how many 13:45:35 EndoWrists were collected from Marin? 13:45:41 A. I was told at the time, I 13:45:46 don't remember the exact number, but I 13:45:48 believe it was less than 20. 13:45:49 Q. Do you know how many 13:45:51 EndoWrists from Marin were actually 13:45:54 reset with additional uses? 13:45:57 A. No. 13:45:59 Q. Do you know how many at the 13:46:02 time that there were that you were 13:46:05 told there were collection bins 13:46:07 available for EndoWrists to be 13:46:09 collected by SIS, do you know how many 13:46:11	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	they had bins available for collection, 13:47:18 that there were 20 EndoWrists that were 13:47:20 collected by SIS. Can you hold that 13:47:23 assumption in your head also? 13:47:27 A. Yes. 13:47:30 Q. Based on the way you've gone 13:47:30 about your work in this matter in 13:47:34 developing and identifying the 13:47:36 collection rate, would you agree that 13:47:38 the collection rate for that, for 13:47:39 MarinHealth, was 20 percent? 13:47:42 MR. VAN HOVEN: Objection to 13:47:43 form. 13:47:46 Q. Under that hypothetical, is 13:47:46 it a 20 percent collection rate, from 13:47:51 MR. VAN HOVEN: Objection to 13:47:51 form. 13:47:52 A. Yes, the program had just 13:47:52 started. 13:47:56 Q. Right, I'm asking you a 13:47:57 hypothetical. You've already told me 13:47:59

1	LGARGENE		LCADGENE
1	J. SARGENT correct? SIS collected under 20 13:48:09	1	J. SARGENT
2		2	under 50? 13:50:03
3	EndoWrists from Marin, correct? 13:48:13	3	A. I would say it's somewhere 13:50:04
4	A. Yes. 13:48:17	4	around 50. Marin is a smaller 13:50:09
5	Q. And you've already told me 13:48:17	5	hospital, doesn't have high volumes. 13:50:13
6	you don't know how many EndoWrists were 13:48:19	6	Q. Have you worked with any 13:50:15
7	in inventory, right? 13:48:22	7	hospitals that have high volumes of 13:50:18
8	A. Correct. 13:48:26	8	EndoWrist instrument usage? 13:50:22
9	Q. So I'm just assume that 13:48:27	9	A. I would assume Piedmont. But 13:50:29
10	there were a hundred EndoWrists in 13:48:29	10	as I mentioned earlier, that wasn't 13:50:33
11	inventory, okay, and assume that there 13:48:31	11	part of our purview at that time. 13:50:35
12	were 20 collected. I'm trying to 13:48:34	12	Q. So you don't know what the 13:50:38
13	understand, is it correct for me to 13:48:36	13	usage, the number of EndoWrist 13:50:39
14	just take 20, divide it by a hundred to 13:48:38	14	instruments that Piedmont used while 13:50:44
15	get to what you view as a collection 13:48:42	15	you were there? 13:50:46
16	rate? 13:48:44	16	A. No. Or University of 13:50:47
17	MR. VAN HOVEN: Objection to 13:48:44	17	Kentucky or USC or UCLA. 13:50:51
18	form. 13:48:45	18	Q. Okay. So when you are you 13:50:56
19	A. No. 13:48:45	19	assuming that all Vizient members would 13:51:00
20	Q. What would be the collection 13:48:54	20	use SIS's reset service? 13:51:02
21	rate if I tell you that Marin had 100 13:48:56	21	A. I'm assuming 70 to 80 percent 13:51:08
22	EndoWrists in its inventory at the 13:49:00	22	would, yes. 13:51:10
23	time, that there were bins available, 13:49:05	23	Q. And is that 70 to 80 percent 13:51:13
24	and that SIS collected 20 EndoWrists, 13:49:06	24	of all the SIS and robot owners? 13:51:18
25	are you able to tell me what the 13:49:11	25	A. Yes. 13:51:23
	Page 218		Page 220
1	J. SARGENT	1	J. SARGENT
2	collection rate is? 13:49:12	2	Q. Do you know how many Vizient 13:51:25
2 3	collection rate is? 13:49:12 MR. VAN HOVEN: Objection to 13:49:13	2 3	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27
2 3 4	collection rate is? 13:49:12 MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15	2 3 4	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32
2 3 4 5	collection rate is? 13:49:12 MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15	2 3 4 5	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33
2 3 4 5 6	collection rate is? 13:49:12 MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17	2 3 4 5 6	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35
2 3 4 5 6 7	collection rate is? 13:49:12 MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19	2 3 4 5	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38
2 3 4 5 6 7 8	collection rate is? 13:49:12 MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21	2 3 4 5 6 7 8	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41
2 3 4 5 6 7 8 9	collection rate is? 13:49:12 MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23	2 3 4 5 6 7 8 9	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43
2 3 4 5 6 7 8 9	collection rate is? 13:49:12 MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24	2 3 4 5 6 7 8 9	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46
2 3 4 5 6 7 8 9 10 11	collection rate is? MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:26	2 3 4 5 6 7 8 9 10 11	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:47
2 3 4 5 6 7 8 9 10 11 12	collection rate is? MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:26 the EndoWrist service being offered by 13:49:31	2 3 4 5 6 7 8 9 10 11 12	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:47 members in 2020 had S and Si robots? 13:51:51
2 3 4 5 6 7 8 9 10 11 12 13	collection rate is? MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:26 the EndoWrist service being offered by 13:49:31 SIS was 75 percent, were you assuming 13:49:35	2 3 4 5 6 7 8 9 10 11 12 13	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:47 members in 2020 had S and Si robots? 13:51:51 A. No. 13:51:54
2 3 4 5 6 7 8 9 10 11 12 13	collection rate is? MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:26 the EndoWrist service being offered by 13:49:31 SIS was 75 percent, were you assuming 13:49:35 that the available population was only 13:49:39	2 3 4 5 6 7 8 9 10 11 12 13	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:51 A. No. 13:51:54 Q. Do you know how many Vizient 13:51:54
2 3 4 5 6 7 8 9 10 11 12 13 14 15	collection rate is? MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:26 the EndoWrist service being offered by 13:49:31 SIS was 75 percent, were you assuming 13:49:35 that the available population was only 13:49:39 those that were in use? 13:49:41	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:51 A. No. 13:51:54 Q. Do you know how many Vizient 13:51:54 members in 2021 had S and Si robots? 13:51:54 members in 2021 had S and Si robots? 13:51:57
2 3 4 5 6 7 8 9 10 11 12 13 14 15	MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:26 the EndoWrist service being offered by 13:49:31 SIS was 75 percent, were you assuming 13:49:35 that the available population was only 13:49:39 those that were in use? 13:49:41 A. Yes. 13:49:44	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:47 members in 2020 had S and Si robots? 13:51:51 A. No. 13:51:54 Q. Do you know how many Vizient 13:51:54 Money and S and Si robots? 13:51:54 Money and S and Si robots? 13:51:54 Money and S and Si robots? 13:51:57 A. No. 13:52:00
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:26 the EndoWrist service being offered by 13:49:31 SIS was 75 percent, were you assuming 13:49:35 that the available population was only 13:49:39 those that were in use? 13:49:41 A. Yes. 13:49:44 Q. Okay. Do you know how many 13:49:45	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:47 members in 2020 had S and Si robots? 13:51:51 A. No. 13:51:54 Q. Do you know how many Vizient 13:51:54 Members in 2021 had S and Si robots? 13:51:57 A. No. 13:52:00 Q. Do you know, sitting here 13:52:00
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:26 the EndoWrist service being offered by 13:49:31 SIS was 75 percent, were you assuming 13:49:35 that the available population was only 13:49:39 those that were in use? 13:49:41 A. Yes. 13:49:44 Q. Okay. Do you know how many 13:49:45 EndoWrists were in use at Marin at the 13:49:47	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:47 members in 2020 had S and Si robots? 13:51:51 A. No. 13:51:54 Q. Do you know how many Vizient 13:51:54 Members in 2021 had S and Si robots? 13:51:57 A. No. 13:52:00 Q. Do you know, sitting here 13:52:00 today, how many S and Si robots there 13:52:03
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:31 SIS was 75 percent, were you assuming 13:49:35 that the available population was only 13:49:39 those that were in use? 13:49:41 A. Yes. 13:49:44 Q. Okay. Do you know how many 13:49:45 EndoWrists were in use at Marin at the 13:49:47 time that there were collection bins 13:49:51	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:47 members in 2020 had S and Si robots? 13:51:51 A. No. 13:51:54 Q. Do you know how many Vizient 13:51:54 members in 2021 had S and Si robots? 13:51:57 A. No. 13:52:00 Q. Do you know, sitting here 13:52:00 today, how many S and Si robots there 13:52:03 were in service in 2019, 2020 or 2021? 13:52:06
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:31 SIS was 75 percent, were you assuming 13:49:35 that the available population was only 13:49:39 those that were in use? 13:49:41 A. Yes. 13:49:44 Q. Okay. Do you know how many 13:49:45 EndoWrists were in use at Marin at the 13:49:47 time that there were collection bins 13:49:51 available? 13:49:52	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:47 members in 2020 had S and Si robots? 13:51:51 A. No. 13:51:54 Q. Do you know how many Vizient 13:51:54 members in 2021 had S and Si robots? 13:51:57 A. No. 13:52:00 Q. Do you know, sitting here 13:52:00 today, how many S and Si robots there 13:52:03 were in service in 2019, 2020 or 2021? 13:52:06 A. No. 13:52:09
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	mr. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:26 the EndoWrist service being offered by 13:49:31 SIS was 75 percent, were you assuming 13:49:35 that the available population was only 13:49:39 those that were in use? 13:49:41 A. Yes. 13:49:44 Q. Okay. Do you know how many 13:49:45 EndoWrists were in use at Marin at the 13:49:47 time that there were collection bins 13:49:51 available? 13:49:52 A. No. 13:49:52	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:47 members in 2020 had S and Si robots? 13:51:51 A. No. 13:51:54 Q. Do you know how many Vizient 13:51:57 A. No. 13:52:00 Q. Do you know, sitting here 13:52:00 today, how many S and Si robots there 13:52:03 were in service in 2019, 2020 or 2021? 13:52:06 A. No. 13:52:09 Q. Has it come to your 13:52:10
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:26 the EndoWrist service being offered by 13:49:31 SIS was 75 percent, were you assuming 13:49:35 that the available population was only 13:49:39 those that were in use? 13:49:41 A. Yes. 13:49:44 Q. Okay. Do you know how many 13:49:45 EndoWrists were in use at Marin at the 13:49:47 time that there were collection bins 13:49:51 available? 13:49:52 A. No. 13:49:52 Q. Do you think it's over or 13:49:54	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:47 members in 2020 had S and Si robots? 13:51:51 A. No. 13:51:54 Q. Do you know how many Vizient 13:51:54 Members in 2021 had S and Si robots? 13:51:54 members in 2021 had S and Si robots? 13:51:57 A. No. 13:52:00 Q. Do you know, sitting here 13:52:00 today, how many S and Si robots there 13:52:03 were in service in 2019, 2020 or 2021? 13:52:06 A. No. 13:52:09 Q. Has it come to your 13:52:10 attention, sitting here today, that 13:52:14
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:31 SIS was 75 percent, were you assuming 13:49:35 that the available population was only 13:49:39 those that were in use? 13:49:41 A. Yes. 13:49:44 Q. Okay. Do you know how many 13:49:45 EndoWrists were in use at Marin at the 13:49:47 time that there were collection bins 13:49:51 available? 13:49:52 A. No. 13:49:54 under a hundred? 13:49:58	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:47 members in 2020 had S and Si robots? 13:51:51 A. No. 13:51:54 Q. Do you know how many Vizient 13:51:54 members in 2021 had S and Si robots? 13:51:57 A. No. 13:52:00 Q. Do you know, sitting here 13:52:00 today, how many S and Si robots there 13:52:03 were in service in 2019, 2020 or 2021? 13:52:06 A. No. 13:52:09 Q. Has it come to your 13:52:10 attention, sitting here today, that 13:52:14 there are very few S and Si robots in 13:52:16
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:31 SIS was 75 percent, were you assuming 13:49:35 that the available population was only 13:49:39 those that were in use? 13:49:41 A. Yes. 13:49:44 Q. Okay. Do you know how many 13:49:45 EndoWrists were in use at Marin at the 13:49:47 time that there were collection bins 13:49:51 available? 13:49:52 A. No. 13:49:52 Q. Do you think it's over or 13:49:54 under a hundred? 13:49:59	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:47 members in 2020 had S and Si robots? 13:51:51 A. No. 13:51:54 Q. Do you know how many Vizient 13:51:54 members in 2021 had S and Si robots? 13:51:57 A. No. 13:52:00 Q. Do you know, sitting here 13:52:00 today, how many S and Si robots there 13:52:03 were in service in 2019, 2020 or 2021? 13:52:06 A. No. 13:52:09 Q. Has it come to your 13:52:10 attention, sitting here today, that 13:52:14 there are very few S and Si robots in 13:52:16 use in the United States? 13:52:19
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. VAN HOVEN: Objection to 13:49:13 form. 13:49:15 A. No, because we don't know how 13:49:15 many of them were in use and how many 13:49:17 of them were sitting on the shelf new, 13:49:19 waiting to be used. We just know what 13:49:21 was collected. 13:49:23 Q. Okay. So in paragraph 56, 13:49:24 when you wrote, The collection rate for 13:49:31 SIS was 75 percent, were you assuming 13:49:35 that the available population was only 13:49:39 those that were in use? 13:49:41 A. Yes. 13:49:44 Q. Okay. Do you know how many 13:49:45 EndoWrists were in use at Marin at the 13:49:47 time that there were collection bins 13:49:51 available? 13:49:52 A. No. 13:49:54 under a hundred? 13:49:58	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Do you know how many Vizient 13:51:25 members in 2019 had S and Si robots? 13:51:27 A. I don't know the number, but 13:51:32 it was predominant. 13:51:33 Q. How do you know that? 13:51:35 A. Well, because most of the 13:51:38 facilities don't have the money to buy 13:51:41 the new robot or get the upgrades when 13:51:43 the upgrades come out. 13:51:46 Q. Do you know how many Vizient 13:51:47 members in 2020 had S and Si robots? 13:51:51 A. No. 13:51:54 Q. Do you know how many Vizient 13:51:54 members in 2021 had S and Si robots? 13:51:57 A. No. 13:52:00 Q. Do you know, sitting here 13:52:00 today, how many S and Si robots there 13:52:03 were in service in 2019, 2020 or 2021? 13:52:06 A. No. 13:52:09 Q. Has it come to your 13:52:10 attention, sitting here today, that 13:52:14 there are very few S and Si robots in 13:52:16

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	J. SARGENT	1	J. SARGENT
1 3	form. 13:52:23	2	MR. VAN HOVEN: Objection to 13:54:21
	A. As of today, yes. 13:52:23	3	form. 13:54:21
4	Q. Right. And has it come to 13:52:24	4	A. I'm not I'm not talking 13:54:21
5	your attention that there came a time 13:52:28	5	specifically about the number of 13:54:27
6	when Intuitive started to phase out the 13:52:30	6	hospitals, I'm just saying of the 13:54:28
7	S and Si robots? 13:52:35	7	number of hospitals that have the S or 13:54:30
8	A. Yes. 13:52:35	8	Si, 70 to 80 percent would use this 13:54:34
9	Q. Does it matter to your 13:52:35	9	program. 13:54:37
10	opinions how many Vizient members 13:52:37	10	Q. Is there any way, based on 13:54:37
11	actually had S and Si robots in 2019 to 13:52:41	11	what you've done in your report, for me 13:54:40
12	2021? 13:52:45	12	to determine how many EndoWrists would 13:54:42
13	A. My percentages are based upon 13:52:46	13	be collected by SIS from Vizient 13:54:44
14	a number of hospitals that would 13:52:52	14	members? 13:54:48
15	actually have the S or Si robot. 13:53:00	15	A. No. 13:54:50
16	Q. Let me just clarify so the 13:53:08	16	MR. VAN HOVEN: Objection to 13:54:50
17	court reporter gets this right. I 13:53:10	17	form. 13:54:53
18	think what you said, and just correct 13:53:11	18	A. No. 13:54:53
19	me, is your percentages are based upon 13:53:12	19	Q. What methodology did you use 13:54:53
20	a number of hospitals that would 13:53:15	20	to determine that SIS would achieve a 13:55:02
21	actually have the S or Si robot; is 13:53:16	21	75 percent collection rate 13:55:04
22	that right? 13:53:22	22	75 percent collection rate of 13:55:06
23	A. Yes. 13:53:22	23	EndoWrists from Vizient members? 13:55:08
24	Q. You don't list anywhere in 13:53:23	24	A. Based on the cost savings 13:55:13
25	your report or your rebuttal report how 13:53:25 Page 222	25	that, every hospital is looking for 13:55:16 Page 224
1	J. SARGENT	1	I GARGENE
	J. BIRGEIVI		LSARGENT
	many Vizient members had S and Si 13:53:28	1 2	J. SARGENT cost savings opportunities, that they 13:55:19
2	many Vizient members had S and Si 13:53:28 robots in 2019, correct? 13:53:31	2	cost savings opportunities, that they 13:55:19
2 3	robots in 2019, correct? 13:53:31	2 3	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22
2 3 4	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35	2 3 4	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25
2 3 4 5	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36	2 3 4 5	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29
2 3 4 5 6	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39	2 3 4 5 6	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33
2 3 4 5 6 7	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41	2 3 4 5	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29
2 3 4 5 6 7 8	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46	2 3 4 5 6 7	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38
2 3 4 5 6 7	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41	2 3 4 5 6 7 8	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37
2 3 4 5 6 7 8 9	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46	2 3 4 5 6 7 8 9	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41
2 3 4 5 6 7 8 9	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46 percentages in your report are based 13:53:47	2 3 4 5 6 7 8 9	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41 from your perspective, that means that 13:55:45
2 3 4 5 6 7 8 9 10	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46 percentages in your report are based 13:53:47 upon the number of hospitals that would 13:53:49	2 3 4 5 6 7 8 9 10 11	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41 from your perspective, that means that 13:55:45 Vizient hospitals are going to be very 13:55:47
2 3 4 5 6 7 8 9 10 11 12	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46 percentages in your report are based 13:53:47 upon the number of hospitals that would 13:53:49 actually have the S or Si robot, what 13:53:51	2 3 4 5 6 7 8 9 10 11 12	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41 from your perspective, that means that 13:55:45 Vizient hospitals are going to be very 13:55:47 interested in this program; isn't that 13:55:50
2 3 4 5 6 7 8 9 10 11 12 13	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46 percentages in your report are based 13:53:47 upon the number of hospitals that would 13:53:49 actually have the S or Si robot, what 13:53:51 were you actually talking about? 13:53:55	2 3 4 5 6 7 8 9 10 11 12 13	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41 from your perspective, that means that 13:55:45 Vizient hospitals are going to be very 13:55:47 interested in this program; isn't that 13:55:50 right? 13:55:52
2 3 4 5 6 7 8 9 10 11 12 13 14	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46 percentages in your report are based 13:53:47 upon the number of hospitals that would 13:53:49 actually have the S or Si robot, what 13:53:51 were you actually talking about? 13:53:55 A. What I'm referring to is 13:53:57	2 3 4 5 6 7 8 9 10 11 12 13 14	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41 from your perspective, that means that 13:55:45 Vizient hospitals are going to be very 13:55:47 interested in this program; isn't that 13:55:50 right? 13:55:52 A. Yes. 13:55:54
2 3 4 5 6 7 8 9 10 11 12 13 14 15	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46 percentages in your report are based 13:53:47 upon the number of hospitals that would 13:53:49 actually have the S or Si robot, what 13:53:51 were you actually talking about? 13:53:55 A. What I'm referring to is 13:53:57 that, the number of hospitals that 13:53:58	2 3 4 5 6 7 8 9 10 11 12 13 14	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41 from your perspective, that means that 13:55:45 Vizient hospitals are going to be very 13:55:47 interested in this program; isn't that 13:55:50 right? 13:55:52 A. Yes. 13:55:54 Q. Okay. And so I'm trying to 13:55:54
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46 percentages in your report are based 13:53:47 upon the number of hospitals that would 13:53:49 actually have the S or Si robot, what 13:53:51 were you actually talking about? 13:53:55 A. What I'm referring to is 13:53:57 that, the number of hospitals that 13:53:58 would have a cost savings opportunity, 13:54:00	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41 from your perspective, that means that 13:55:45 Vizient hospitals are going to be very 13:55:47 interested in this program; isn't that 13:55:50 right? 13:55:52 A. Yes. 13:55:54 Q. Okay. And so I'm trying to 13:55:54 understand what methodology you used to 13:55:57
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46 percentages in your report are based 13:53:47 upon the number of hospitals that would 13:53:49 actually have the S or Si robot, what 13:53:51 were you actually talking about? 13:53:55 A. What I'm referring to is 13:53:57 that, the number of hospitals that 13:53:58 would have a cost savings opportunity, 13:54:00 because there are no cost saving 13:54:02	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41 from your perspective, that means that 13:55:45 Vizient hospitals are going to be very 13:55:47 interested in this program; isn't that 13:55:50 right? 13:55:52 A. Yes. 13:55:54 Q. Okay. And so I'm trying to 13:55:57 arrive at the 75 percent number of the 13:55:59
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46 percentages in your report are based 13:53:47 upon the number of hospitals that would 13:53:49 actually have the S or Si robot, what 13:53:51 were you actually talking about? 13:53:55 A. What I'm referring to is 13:53:57 that, the number of hospitals that 13:53:58 would have a cost savings opportunity, 13:54:00 because there are no cost saving 13:54:02 opportunities directly with Intuitive. 13:54:04	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41 from your perspective, that means that 13:55:45 Vizient hospitals are going to be very 13:55:47 interested in this program; isn't that 13:55:50 right? 13:55:52 A. Yes. 13:55:54 Q. Okay. And so I'm trying to 13:55:54 understand what methodology you used to 13:55:57 arrive at the 75 percent number of the 13:55:59 collection of EndoWrists from Vizient 13:56:02 hospitals? 13:56:06
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46 percentages in your report are based 13:53:47 upon the number of hospitals that would 13:53:49 actually have the S or Si robot, what 13:53:51 were you actually talking about? 13:53:55 A. What I'm referring to is 13:53:57 that, the number of hospitals that 13:53:58 would have a cost savings opportunity, 13:54:00 because there are no cost saving 13:54:04 If there was a third party that is 13:54:06 offering a cost savings opportunity, 13:54:09	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41 from your perspective, that means that 13:55:45 Vizient hospitals are going to be very 13:55:47 interested in this program; isn't that 13:55:50 right? 13:55:52 A. Yes. 13:55:54 Q. Okay. And so I'm trying to 13:55:54 understand what methodology you used to 13:55:57 arrive at the 75 percent number of the 13:55:59 collection of EndoWrists from Vizient 13:56:02 hospitals? 13:56:06
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46 percentages in your report are based 13:53:47 upon the number of hospitals that would 13:53:49 actually have the S or Si robot, what 13:53:51 were you actually talking about? 13:53:55 A. What I'm referring to is 13:53:57 that, the number of hospitals that 13:53:58 would have a cost savings opportunity, 13:54:00 because there are no cost saving 13:54:04 If there was a third party that is 13:54:06 offering a cost savings opportunity, 13:54:09	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41 from your perspective, that means that 13:55:45 Vizient hospitals are going to be very 13:55:47 interested in this program; isn't that 13:55:50 right? 13:55:52 A. Yes. 13:55:54 Q. Okay. And so I'm trying to 13:55:54 understand what methodology you used to 13:55:57 arrive at the 75 percent number of the 13:55:59 collection of EndoWrists from Vizient 13:56:02 hospitals? 13:56:06 A. That's based on my experience 13:56:06
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46 percentages in your report are based 13:53:47 upon the number of hospitals that would 13:53:49 actually have the S or Si robot, what 13:53:51 were you actually talking about? 13:53:55 A. What I'm referring to is 13:53:57 that, the number of hospitals that 13:53:58 would have a cost savings opportunity, 13:54:00 because there are no cost saving 13:54:04 If there was a third party that is 13:54:06 offering a cost savings opportunity, 13:54:09 that most of those hospitals, 70 to 13:54:12	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41 from your perspective, that means that 13:55:45 Vizient hospitals are going to be very 13:55:47 interested in this program; isn't that 13:55:50 right? 13:55:52 A. Yes. 13:55:54 Q. Okay. And so I'm trying to 13:55:54 understand what methodology you used to 13:55:57 arrive at the 75 percent number of the 13:55:59 collection of EndoWrists from Vizient 13:56:02 hospitals? 13:56:06 A. That's based on my experience 13:56:06 and talking with my colleagues and my 13:56:15
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46 percentages in your report are based 13:53:47 upon the number of hospitals that would 13:53:49 actually have the S or Si robot, what 13:53:51 were you actually talking about? 13:53:55 A. What I'm referring to is 13:53:57 that, the number of hospitals that 13:53:58 would have a cost savings opportunity, 13:54:00 because there are no cost saving 13:54:02 opportunities directly with Intuitive. 13:54:04 If there was a third party that is 13:54:06 offering a cost savings opportunity, 13:54:09 that most of those hospitals, 70 to 13:54:12 80 percent of them would jump on the 13:54:15	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41 from your perspective, that means that 13:55:45 Vizient hospitals are going to be very 13:55:47 interested in this program; isn't that 13:55:50 right? 13:55:52 A. Yes. 13:55:54 Q. Okay. And so I'm trying to 13:55:54 understand what methodology you used to 13:55:57 arrive at the 75 percent number of the 13:55:59 collection of EndoWrists from Vizient 13:56:02 hospitals? 13:56:06 A. That's based on my experience 13:56:06 and talking with my colleagues and my 13:56:15 peers in regards to what kind of 13:56:17
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	robots in 2019, correct? 13:53:31 A. Correct. 13:53:35 Q. You don't list the number of 13:53:36 S and Si robots that Vizient members 13:53:39 had for any given year, correct? 13:53:41 A. Correct. 13:53:46 Q. So when you say your 13:53:46 percentages in your report are based 13:53:47 upon the number of hospitals that would 13:53:49 actually have the S or Si robot, what 13:53:51 were you actually talking about? 13:53:55 A. What I'm referring to is 13:53:57 that, the number of hospitals that 13:53:58 would have a cost savings opportunity, 13:54:00 because there are no cost saving 13:54:04 If there was a third party that is 0ffering a cost savings opportunity, 13:54:06 offering a cost savings opportunity, 13:54:09 that most of those hospitals, 70 to 13:54:12 80 percent of them would jump on the 13:54:15 opportunity to save costs. 13:54:16	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	cost savings opportunities, that they 13:55:19 would sign on for this program. 13:55:22 Q. Okay. So I understand that 13:55:25 you're referring to the 40 percent cost 13:55:29 savings that Mr. Johnson told you 13:55:33 about, right? 13:55:37 A. Yes. 13:55:38 Q. So I understand that to you, 13:55:41 from your perspective, that means that 13:55:45 Vizient hospitals are going to be very 13:55:47 interested in this program; isn't that 13:55:50 right? 13:55:52 A. Yes. 13:55:54 Q. Okay. And so I'm trying to 13:55:54 understand what methodology you used to 13:55:57 arrive at the 75 percent number of the 13:55:59 collection of EndoWrists from Vizient 13:56:02 hospitals? 13:56:06 A. That's based on my experience 13:56:15 peers in regards to what kind of 13:56:17 opportunities they come up with for 13:56:19

			Y G + D GDVIII
1	J. SARGENT	1	J. SARGENT
2	75 percent of all Vizient member 13:56:29	2	56, correct? 13:58:24
3	hospitals with an Si robots would 13:56:32	3	A. Yes. 13:58:25
4	participate in this program? 13:56:37	4	Q. What did you mean by that? 13:58:36
5	MR. VAN HOVEN: Objection to 13:56:38	5	A. Similar to what I just 13:58:42
6	form. 13:56:42	6	mentioned. We had a there's an 13:58:43
7	A. Yes. 13:56:42	7	opportunity to mitigate expenses, as 13:58:46
8	Q. So you're not offering any 13:56:43	8	well as patient safety, by starting a 13:58:51
9	opinion as to how many actual 13:56:44	9	collection or reprocessing of a 13:58:54
10	EndoWrists would be collected pursuant 13:56:49	10	product. And it occurred immediately. 13:58:56
11	to this program from Vizient members; 13:56:50	11	Q. You did not look at any 13:58:58
12	is that right? 13:56:53	12	literature to identify general industry 13:59:03
13	MR. VAN HOVEN: Objection to 13:56:53	13	collection rates, am I right about 13:59:09
14	form. 13:56:55	14	that? 13:59:10
15	A. Correct. 13:56:55	15	A. Correct. 13:59:10
16	Q. And am I right, you are not 13:56:55	16	Q. Did you look at any industry 13:59:11
17	offering any opinions about the 13:56:57	17	data to understand what general 13:59:14
18	collection or penetration rates of 13:57:00	18	industry collection rates are? 13:59:16
19	non-Vizient member hospitals, correct? 13:57:03	19	A. No. 13:59:17
20	A. Correct. 13:57:06	20	Q. Did you look at any studies 13:59:25
21	Q. Mr. Johnson did not tell you 13:57:07	21	that have been done about general 13:59:27
22	anything about the collection rate that 13:57:13	22	industry collection rates? 13:59:29
23	SIS expected; is that right? 13:57:16	23	A. No. It's based on my 13:59:35
24	A. No, not that I recall. 13:57:21	24	experience. 13:59:36
25	Q. What analysis did you do to 13:57:22 Page 226	25	Q. Did you look at any studies 13:59:36 Page 228
1	I CADCENT	1	I CADCENT
1	J. SARGENT	1	J. SARGENT
2	arrive at the 75 percent number you 13:57:26	2	of individual instrument collection 13:59:38
2 3	arrive at the 75 percent number you 13:57:26 list in your report, as opposed to any 13:57:28	2 3	of individual instrument collection 13:59:38 programs? 13:59:41
2 3 4	arrive at the 75 percent number you 13:57:26 list in your report, as opposed to any other number that you could have put 13:57:30	2 3 4	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43
2 3 4 5	arrive at the 75 percent number you list in your report, as opposed to any other number that you could have put there? 13:57:26 13:57:28 13:57:30	2 3 4 5	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46
2 3 4 5 6	arrive at the 75 percent number you 13:57:26 list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:34	2 3 4 5	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46
2 3 4 5 6 7	arrive at the 75 percent number you list in your report, as opposed to any other number that you could have put there? 13:57:28 13:57:28 13:57:30 13:57:34 MR. VAN HOVEN: Objection to form. 13:57:35	2 3 4 5 4 6 7	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50
2 3 4 5 6 7 8	arrive at the 75 percent number you list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in 13:57:35	2 3 4 5 1 6 7 8	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52
2 3 4 5 6 7 8 9	arrive at the 75 percent number you list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce 13:57:40	2 3 4 5 4 6 7 8	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55
2 3 4 5 6 7 8 9	arrive at the 75 percent number you list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate 13:57:44	2 3 4 5 4 6 7 8 9	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57
2 3 4 5 6 7 8 9 10	arrive at the 75 percent number you list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate of return for those types of products. 13:57:48	2 3 4 5 4 6 7 8 9 10	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57 Q. Did you talk to any Vizient 14:00:04
2 3 4 5 6 7 8 9 10 11 12	list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate of return for those types of products. And actually, just recently I saw a 13:57:52	2 3 4 5 4 6 7 8 9 10 11 12	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57 Q. Did you talk to any Vizient 14:00:04 member hospitals about whether they 14:00:07
2 3 4 5 6 7 8 9 10 11 12 13	arrive at the 75 percent number you list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate of return for those types of products. And actually, just recently I saw a hospital that on Wednesday they said, 13:57:54	2 3 4 5 4 6 7 8 9 10 11 12 13	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57 Q. Did you talk to any Vizient 14:00:04 member hospitals about whether they 14:00:07 would take advantage of the SIS 14:00:09
2 3 4 5 6 7 8 9 10 11 12 13 14	arrive at the 75 percent number you list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate of return for those types of products. And actually, just recently I saw a hospital that on Wednesday they said, You know what, we need to start 13:57:26 13:57:28 13:57:30 13:57:30 13:57:34 13:57:35 13:57:35 13:57:35 13:57:44 13:57:54 13:57:54	2 3 4 5 7 8 9 10 11 12 13	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57 Q. Did you talk to any Vizient 14:00:04 member hospitals about whether they 14:00:07 would take advantage of the SIS 14:00:09 program? 14:00:10
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate of return for those types of products. And actually, just recently I saw a hospital that on Wednesday they said, You know what, we need to start collecting a tourniquet that is on 13:57:58 manufacturer back order, but it can be 13:57:28 13:57:28 13:57:30 13:57:30 13:57:35 13:57:35 13:57:35 13:57:44 13:57:48 13:57:56 13:57:56 13:57:56	2 3 4 5 7 8 9 10 11 12 13 14 15 16	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57 Q. Did you talk to any Vizient 14:00:04 member hospitals about whether they 14:00:07 would take advantage of the SIS 14:00:09 program? 14:00:10 A. No. 14:00:13 Q. Did you talk to any Vizient 14:00:13
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:34 form. 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate of return for those types of products. And actually, just recently I saw a hospital that on Wednesday they said, You know what, we need to start 13:57:58 manufacturer back order, but it can be reprocessed, so we need to start 13:58:04	2 3 4 5 7 8 9 10 11 12 13 14 15 16 17	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57 Q. Did you talk to any Vizient 14:00:04 member hospitals about whether they 14:00:07 would take advantage of the SIS 14:00:10 A. No. 14:00:13 Q. Did you talk to any Vizient 14:00:13 hospitals back in 2019, besides Marin, 14:00:18
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate of return for those types of products. And actually, just recently I saw a hospital that on Wednesday they said, You know what, we need to start collecting a tourniquet that is on manufacturer back order, but it can be reprocessed, so we need to start collecting them. That was on 13:58:06	2 3 4 5 7 8 9 10 11 12 13 14 15 16 17 18	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57 Q. Did you talk to any Vizient 14:00:04 member hospitals about whether they 14:00:07 would take advantage of the SIS 14:00:10 A. No. 14:00:13 Q. Did you talk to any Vizient 14:00:13 hospitals back in 2019, besides Marin, 14:00:18 about whether they would take advantage 14:00:21
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate of return for those types of products. And actually, just recently I saw a hospital that on Wednesday they said, 13:57:54 You know what, we need to start collecting a tourniquet that is on manufacturer back order, but it can be reprocessed, so we need to start collecting them. That was on 13:58:06 Wednesday. On Friday, the bins were in 13:58:07	2 3 4 5 1 6 7 8 9 10 11 12 13 14 15 16 17 18 19	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57 Q. Did you talk to any Vizient 14:00:04 member hospitals about whether they 14:00:07 would take advantage of the SIS 14:00:09 program? 14:00:13 Q. Did you talk to any Vizient 14:00:13 hospitals back in 2019, besides Marin, 14:00:18 about whether they would take advantage 14:00:21 of this program being offered by SIS? 14:00:23
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate of return for those types of products. And actually, just recently I saw a hospital that on Wednesday they said, You know what, we need to start collecting a tourniquet that is on manufacturer back order, but it can be reprocessed, so we need to start collecting them. That was on 13:58:06 Wednesday. On Friday, the bins were in 13:58:09 ORs and the collections had started. 13:58:09	2 3 4 5 7 8 9 10 11 12 13 14 15 16 17 18 19 20	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57 Q. Did you talk to any Vizient 14:00:04 member hospitals about whether they 14:00:07 would take advantage of the SIS 14:00:09 program? 14:00:10 A. No. 14:00:13 Q. Did you talk to any Vizient 14:00:13 hospitals back in 2019, besides Marin, 14:00:18 about whether they would take advantage 14:00:21 of this program being offered by SIS? 14:00:23 A. No, I didn't have the 14:00:28
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate of return for those types of products. And actually, just recently I saw a hospital that on Wednesday they said, You know what, we need to start collecting a tourniquet that is on manufacturer back order, but it can be reprocessed, so we need to start collecting them. That was on 13:58:06 Wednesday. On Friday, the bins were in 13:58:09 So that's when I mentioned that it's a 13:58:12	2 3 4 5 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57 Q. Did you talk to any Vizient 14:00:04 member hospitals about whether they 14:00:07 would take advantage of the SIS 14:00:09 program? 14:00:10 A. No. 14:00:13 Q. Did you talk to any Vizient 14:00:13 hospitals back in 2019, besides Marin, 14:00:18 about whether they would take advantage 14:00:21 of this program being offered by SIS? 14:00:23 A. No, I didn't have the 14:00:28 opportunity. 14:00:29
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate of return for those types of products. And actually, just recently I saw a hospital that on Wednesday they said, You know what, we need to start collecting a tourniquet that is on manufacturer back order, but it can be reprocessed, so we need to start collecting them. That was on 13:58:06 Wednesday. On Friday, the bins were in 13:58:09 So that's when I mentioned that it's a quick and easy process. It can be a 13:58:16	2 3 4 5 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57 Q. Did you talk to any Vizient 14:00:04 member hospitals about whether they 14:00:07 would take advantage of the SIS 14:00:10 A. No. 14:00:13 Q. Did you talk to any Vizient 14:00:13 hospitals back in 2019, besides Marin, 14:00:18 about whether they would take advantage 14:00:21 of this program being offered by SIS? 14:00:23 A. No, I didn't have the 14:00:28 opportunity. 14:00:29 Q. Okay. So am I right that you 14:00:30
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate of return for those types of products. And actually, just recently I saw a hospital that on Wednesday they said, 13:57:54 You know what, we need to start collecting a tourniquet that is on manufacturer back order, but it can be reprocessed, so we need to start collecting them. That was on Wednesday. On Friday, the bins were in 13:58:09 So that's when I mentioned that it's a quick and easy process. It can be a very quick and easy process. 13:58:18	2 3 4 5 1 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57 Q. Did you talk to any Vizient 14:00:04 member hospitals about whether they 14:00:07 would take advantage of the SIS 14:00:09 program? 14:00:13 Q. Did you talk to any Vizient 14:00:13 hospitals back in 2019, besides Marin, 14:00:18 about whether they would take advantage 14:00:21 of this program being offered by SIS? 14:00:23 A. No, I didn't have the 14:00:28 opportunity. 14:00:29 Q. Okay. So am I right that you 14:00:30 cannot tell me the number of hospitals 14:00:35
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate of return for those types of products. And actually, just recently I saw a hospital that on Wednesday they said, You know what, we need to start collecting a tourniquet that is on manufacturer back order, but it can be reprocessed, so we need to start collecting them. That was on 13:58:06 Wednesday. On Friday, the bins were in 13:58:09 So that's when I mentioned that it's a quick and easy process. Q. You referenced general 13:58:20	2 3 4 5 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57 Q. Did you talk to any Vizient 14:00:04 member hospitals about whether they 14:00:07 would take advantage of the SIS 14:00:09 program? 14:00:13 Q. Did you talk to any Vizient 14:00:13 hospitals back in 2019, besides Marin, 14:00:18 about whether they would take advantage 14:00:21 of this program being offered by SIS? 14:00:23 A. No, I didn't have the 14:00:28 opportunity. 14:00:29 Q. Okay. So am I right that you 14:00:30 cannot tell me the number of hospitals 14:00:35 that you are assuming that SIS would be 14:00:38
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	list in your report, as opposed to any other number that you could have put there? 13:57:34 MR. VAN HOVEN: Objection to 13:57:35 A. Based on my experience, in the reprocessing of products to reduce costs, most hospitals have a high rate of return for those types of products. And actually, just recently I saw a hospital that on Wednesday they said, 13:57:54 You know what, we need to start collecting a tourniquet that is on manufacturer back order, but it can be reprocessed, so we need to start collecting them. That was on Wednesday. On Friday, the bins were in 13:58:09 So that's when I mentioned that it's a quick and easy process. It can be a very quick and easy process. 13:58:18	2 3 4 5 1 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	of individual instrument collection 13:59:38 programs? 13:59:41 MR. VAN HOVEN: Objection to 13:59:43 form. 13:59:46 A. No. 13:59:46 Q. Did you look at any 13:59:50 literature about individual instrument 13:59:52 collection programs? 13:59:55 A. No. 13:59:57 Q. Did you talk to any Vizient 14:00:04 member hospitals about whether they 14:00:07 would take advantage of the SIS 14:00:09 program? 14:00:13 Q. Did you talk to any Vizient 14:00:13 hospitals back in 2019, besides Marin, 14:00:18 about whether they would take advantage 14:00:21 of this program being offered by SIS? 14:00:23 A. No, I didn't have the 14:00:28 opportunity. 14:00:29 Q. Okay. So am I right that you 14:00:30 cannot tell me the number of hospitals 14:00:35

1	J. SARGENT	1	J. SARGENT
2	Q. If you can look at paragraph 15:41:12	2	came up with a similar process. Then 15:56:33
3	27 of Mr. Goodwin's report. 15:41:14	3	it would then SIS would be affected. 15:56:37
4	A. Mm-hmm. 15:41:18	4	Q. But your collection rate and 15:56:41
5	Q. Let me know when you've had a 15:41:19	5	conversion rate assume that SIS is the 15:56:46
6	chance to read that. 15:41:20	6	only entity offering that service to 15:56:49
7	A. Okay. 15:41:58	7	Vizient members, correct? 15:56:53
8	Q. You did not respond to that 15:41:58	8	MR. VAN HOVEN: Objection to 15:56:54
9	paragraph in your rebuttal report; is 15:42:01	9	form. 15:56:54
10	that correct? 15:42:04	10	A. Yes. 15:56:54
11	A. Correct. 15:42:04	11	Q. And those numbers would be 15:56:56
12	Q. Same question, why don't you 15:42:05	12	lower if there was another entity 15:57:00
13	read paragraphs 28 and 29 to yourself 15:42:16	13	offering that service to Vizient 15:57:02
14	and when you're done, let me know. 15:42:18	14	members, correct? 15:57:06
15	A. Okay. 15:42:52	15	MR. VAN HOVEN: Objection to 15:57:06
16	Q. Your rebuttal report does not 15:42:53	16	form. 15:57:08
17	respond to either paragraphs 28 or 29, 15:42:54	17	A. Yes. 15:57:08
18	correct? 15:42:57	18	Q. And am I also right that the 15:57:10
19	A. Correct. 15:42:58	19	penetration rate you've identified 15:57:15
20	MR. LAZEROW: All right, take 15:43:01	20	applies only to Vizient members? 15:57:16
21	a break. 15:43:01	21	A. Yes. 15:57:23
22	THE VIDEOGRAPHER: We are off 15:43:02	22	Q. You have not done anything to 15:57:23
23	the record, the time is 3:43 p.m. 15:43:06	23	investigate whether non-Vizient members 15:57:26
24	Eastern time. 15:43:09	24	would achieve collection rates or 15:57:28
25	(Recess.) 15:43:36	25	penetration rates at the numbers you've 15:57:30
	Page 306		Page 308
1	J. SARGENT	1	J. SARGENT
1 2	J. SARGENT THE VIDEOGRAPHER: We are 15:55:25	1 2	J. SARGENT put in your opening report, correct? 15:57:31
2	THE VIDEOGRAPHER: We are 15:55:25	2	put in your opening report, correct? 15:57:31
2 3	THE VIDEOGRAPHER: We are 15:55:25 back on the record, the time is 15:55:27	2 3	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33
2 3 4	THE VIDEOGRAPHER: We are 15:55:25 back on the record, the time is 15:55:27 3:55 p m. Eastern time. 15:55:29	2 3 4	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33 Q. Can you look, please, at your 15:57:36
2 3 4 5	THE VIDEOGRAPHER: We are 15:55:25 back on the record, the time is 15:55:27 3:55 p m. Eastern time. 15:55:29 Q. Ms. Sargent, am I right that 15:55:33	2 3 4 5	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33 Q. Can you look, please, at your 15:57:36 rebuttal report, and I'm going to 15:57:43
2 3 4 5 6	THE VIDEOGRAPHER: We are 15:55:25 back on the record, the time is 15:55:27 3:55 p m. Eastern time. 15:55:29 Q. Ms. Sargent, am I right that 15:55:33 you do not know what the actual 15:55:35	2 3 4 5 6	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33 Q. Can you look, please, at your 15:57:36 rebuttal report, and I'm going to 15:57:43 which is DX230, and I'm going to 15:57:52
2 3 4 5 6 7	THE VIDEOGRAPHER: We are 15:55:25 back on the record, the time is 15:55:27 3:55 p m. Eastern time. 15:55:29 Q. Ms. Sargent, am I right that 15:55:33 you do not know what the actual 15:55:35 collection rate of EndoWrists were at 15:55:36	2 3 4 5 6 7	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33 Q. Can you look, please, at your 15:57:36 rebuttal report, and I'm going to 15:57:43 which is DX230, and I'm going to 15:57:52 paragraph 12, which is on page 3. 15:57:55
2 3 4 5 6 7 8	THE VIDEOGRAPHER: We are 15:55:25 back on the record, the time is 15:55:27 3:55 p m. Eastern time. 15:55:29 Q. Ms. Sargent, am I right that 15:55:33 you do not know what the actual 15:55:35 collection rate of EndoWrists were at 15:55:36 Marin when it was involved with SIS's 15:55:40	2 3 4 5 6 7 8	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33 Q. Can you look, please, at your 15:57:36 rebuttal report, and I'm going to 15:57:43 which is DX230, and I'm going to 15:57:52 paragraph 12, which is on page 3. 15:57:55 A. Yes. 15:58:03
2 3 4 5 6 7 8 9	THE VIDEOGRAPHER: We are 15:55:25 back on the record, the time is 15:55:27 3:55 p m. Eastern time. 15:55:29 Q. Ms. Sargent, am I right that 15:55:33 you do not know what the actual 15:55:35 collection rate of EndoWrists were at 15:55:36 Marin when it was involved with SIS's 15:55:40 resetting service? 15:55:48	2 3 4 5 6 7 8 9	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33 Q. Can you look, please, at your 15:57:36 rebuttal report, and I'm going to 15:57:43 which is DX230, and I'm going to 15:57:52 paragraph 12, which is on page 3. 15:57:55 A. Yes. 15:58:03 Q. This paragraph talks about 15:58:04
2 3 4 5 6 7 8 9	THE VIDEOGRAPHER: We are 15:55:25 back on the record, the time is 15:55:27 3:55 p m. Eastern time. 15:55:29 Q. Ms. Sargent, am I right that 15:55:33 you do not know what the actual 15:55:35 collection rate of EndoWrists were at 15:55:36 Marin when it was involved with SIS's 15:55:40 resetting service? 15:55:48 A. Correct. 15:55:48	2 3 4 5 6 7 8 9	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33 Q. Can you look, please, at your 15:57:36 rebuttal report, and I'm going to 15:57:43 which is DX230, and I'm going to 15:57:52 paragraph 12, which is on page 3. 15:57:55 A. Yes. 15:58:03 Q. This paragraph talks about 15:58:04 the example you provide of hospitals 15:58:05
2 3 4 5 6 7 8 9 10 11	THE VIDEOGRAPHER: We are 15:55:25 back on the record, the time is 15:55:27 3:55 p m. Eastern time. 15:55:29 Q. Ms. Sargent, am I right that 15:55:33 you do not know what the actual 15:55:35 collection rate of EndoWrists were at 15:55:36 Marin when it was involved with SIS's 15:55:40 resetting service? 15:55:48 A. Correct. 15:55:48 Q. Am I right, you do not know 15:55:49	2 3 4 5 6 7 8 9 10 11	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33 Q. Can you look, please, at your 15:57:36 rebuttal report, and I'm going to 15:57:43 which is DX230, and I'm going to 15:57:52 paragraph 12, which is on page 3. 15:57:55 A. Yes. 15:58:03 Q. This paragraph talks about 15:58:04 the example you provide of hospitals 15:58:05 that were reprocessing single-use 15:58:07
2 3 4 5 6 7 8 9 10 11 12	THE VIDEOGRAPHER: We are 15:55:25 back on the record, the time is 15:55:27 3:55 p m. Eastern time. 15:55:29 Q. Ms. Sargent, am I right that 15:55:33 you do not know what the actual 15:55:35 collection rate of EndoWrists were at 15:55:36 Marin when it was involved with SIS's 15:55:40 resetting service? 15:55:48 A. Correct. 15:55:48 Q. Am I right, you do not know 15:55:49 the collection rate of any hospital 15:55:50	2 3 4 5 6 7 8 9 10 11 12	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33 Q. Can you look, please, at your 15:57:36 rebuttal report, and I'm going to 15:57:43 which is DX230, and I'm going to 15:57:52 paragraph 12, which is on page 3. 15:57:55 A. Yes. 15:58:03 Q. This paragraph talks about 15:58:04 the example you provide of hospitals 15:58:05 that were reprocessing single-use 15:58:07 devices, correct? 15:58:09
2 3 4 5 6 7 8 9 10 11 12 13	THE VIDEOGRAPHER: We are 15:55:25 back on the record, the time is 15:55:27 3:55 p m. Eastern time. 15:55:29 Q. Ms. Sargent, am I right that 15:55:33 you do not know what the actual 15:55:35 collection rate of EndoWrists were at 15:55:36 Marin when it was involved with SIS's 15:55:40 resetting service? 15:55:48 A. Correct. 15:55:48 Q. Am I right, you do not know 15:55:50 with respect to SIS's service for 15:55:52	2 3 4 5 6 7 8 9 10 11 12 13	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33 Q. Can you look, please, at your 15:57:36 rebuttal report, and I'm going to 15:57:43 which is DX230, and I'm going to 15:57:52 paragraph 12, which is on page 3. 15:57:55 A. Yes. 15:58:03 Q. This paragraph talks about 15:58:04 the example you provide of hospitals 15:58:05 that were reprocessing single-use 15:58:07 devices, correct? 15:58:12
2 3 4 5 6 7 8 9 10 11 12 13	THE VIDEOGRAPHER: We are 15:55:25 back on the record, the time is 15:55:27 3:55 p m. Eastern time. 15:55:29 Q. Ms. Sargent, am I right that 15:55:33 you do not know what the actual 15:55:35 collection rate of EndoWrists were at 15:55:36 Marin when it was involved with SIS's 15:55:40 resetting service? 15:55:48 A. Correct. 15:55:48 Q. Am I right, you do not know 15:55:49 the collection rate of any hospital 15:55:50 with respect to SIS's service for 15:55:55 resetting EndoWrists? 15:55:55	2 3 4 5 6 7 8 9 10 11 12 13 14	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33 Q. Can you look, please, at your 15:57:36 rebuttal report, and I'm going to 15:57:43 which is DX230, and I'm going to 15:57:52 paragraph 12, which is on page 3. 15:57:55 A. Yes. 15:58:03 Q. This paragraph talks about 15:58:04 the example you provide of hospitals 15:58:05 that were reprocessing single-use 15:58:07 devices, correct? 15:58:09 A. Correct. 15:58:12 Q. And did any hospitals you 15:58:13
2 3 4 5 6 7 8 9 10 11 12 13 14 15	THE VIDEOGRAPHER: We are 15:55:25 back on the record, the time is 15:55:27 3:55 p m. Eastern time. 15:55:29 Q. Ms. Sargent, am I right that 15:55:33 you do not know what the actual 15:55:35 collection rate of EndoWrists were at 15:55:36 Marin when it was involved with SIS's 15:55:40 resetting service? 15:55:48 A. Correct. 15:55:48 Q. Am I right, you do not know 15:55:49 the collection rate of any hospital 15:55:50 with respect to SIS's service for 15:55:55 resetting EndoWrists? 15:55:55	2 3 4 5 6 7 8 9 10 11 12 13 14 15	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33 Q. Can you look, please, at your 15:57:36 rebuttal report, and I'm going to 15:57:43 which is DX230, and I'm going to 15:57:52 paragraph 12, which is on page 3. 15:57:55 A. Yes. 15:58:03 Q. This paragraph talks about 15:58:04 the example you provide of hospitals 15:58:05 that were reprocessing single-use 15:58:07 devices, correct? 15:58:09 A. Correct. 15:58:12 Q. And did any hospitals you 15:58:13 worked at reprocess single-use devices? 15:58:18
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	THE VIDEOGRAPHER: We are 15:55:25 back on the record, the time is 15:55:27 3:55 p m. Eastern time. 15:55:29 Q. Ms. Sargent, am I right that 15:55:33 you do not know what the actual 15:55:35 collection rate of EndoWrists were at 15:55:36 Marin when it was involved with SIS's 15:55:40 resetting service? 15:55:48 A. Correct. 15:55:48 Q. Am I right, you do not know 15:55:49 the collection rate of any hospital 15:55:50 with respect to SIS's service for 15:55:55 resetting EndoWrists? 15:55:59 Q. And am I also right that 15:55:59	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33 Q. Can you look, please, at your 15:57:36 rebuttal report, and I'm going to 15:57:43 which is DX230, and I'm going to 15:57:52 paragraph 12, which is on page 3. 15:57:55 A. Yes. 15:58:03 Q. This paragraph talks about 15:58:04 the example you provide of hospitals 15:58:05 that were reprocessing single-use 15:58:07 devices, correct? 15:58:09 A. Correct. 15:58:12 Q. And did any hospitals you 15:58:13 worked at reprocess single-use devices? 15:58:18 A. Yes. 15:58:23
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	THE VIDEOGRAPHER: We are back on the record, the time is 15:55:27 3:55 p m. Eastern time. 15:55:29 Q. Ms. Sargent, am I right that 15:55:33 you do not know what the actual 15:55:35 collection rate of EndoWrists were at 15:55:36 Marin when it was involved with SIS's 15:55:40 resetting service? 15:55:48 A. Correct. 15:55:48 Q. Am I right, you do not know 15:55:49 the collection rate of any hospital 15:55:50 with respect to SIS's service for 15:55:55 A. Correct. 15:55:55 A. Correct. 15:55:59 Q. And am I also right that 15:55:59 you're assuming that whatever Vizient 15:56:01 members sign up for resetting an 15:56:06 EndoWrist, that SIS would get all of 15:56:17 that volume, right? 15:56:21 Q. No other entity would get any 15:56:22 volume of resetting of EndoWrists among 15:56:23 the Vizient members, right? 15:56:27	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	put in your opening report, correct? 15:57:31 A. Correct. 15:57:33 Q. Can you look, please, at your 15:57:36 rebuttal report, and I'm going to 15:57:43 which is DX230, and I'm going to 15:57:52 paragraph 12, which is on page 3. 15:57:55 A. Yes. 15:58:03 Q. This paragraph talks about 15:58:04 the example you provide of hospitals 15:58:05 that were reprocessing single-use 15:58:07 devices, correct? 15:58:09 A. Correct. 15:58:12 Q. And did any hospitals you 15:58:13 worked at reprocess single-use devices? 15:58:18 A. Yes. 15:58:23 Q. And did the hospitals you 15:58:26 work at do that in house, or did they 15:58:32 parties? 15:58:37 A. In house. 15:58:37 Q. Were you did you ever tell 15:58:38 any of those hospitals that they were, 15:58:40 these devices were only supposed to be 15:58:43